

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 12-03053-01-CR-S-CDP
	)	
	)	
BRENT "PETE" TURLEY,	)	
	)	
Defendant.	)	

**DEFENDANT'S RESPONSE IN OPPOSITION TO GOVERNMENT'S  
MOTION TO REVOKE BOND**

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COMES NOW Defendant, by counsel, and herein submits the following in opposition to the Government's Motion to Revoke Bond.

1. On August 6, 2012, Defendant was released on bond following a hearing on Defendant's Motion for Reconsideration of Detention Order.

2. Since that time, for over one year, Defendant has exhibited exemplary behavior on bond. There is no individual in the community who is at risk in any fashion by Defendant remaining on bond. Defendant has made all court appearances and has cooperated fully with all that has been asked of him during the pendency of this case. This includes his compliance with the recent amendment to his bond conditions that he register as a sex offender in the State of Missouri in light of the guilty plea.

3. Although 18 U.S.C. § 3143, The Bail Reform Act, may appear to call for Defendant's bond to be revoked, Defendant submits that such was not the intention of

Congress in a case such as this when a defendant has shown such exemplary behavior while on bond.

4. Defendant asks this Court to allow him to continue on his current bond conditions. Defendant has no criminal history and his security classification at the Bureau of Prisons will be severely and negatively impacted if he is taken into custody rather than being allowed to self-surrender.

5. In the event this Court grants the government's motion, Defendant requests that he be allowed to self-surrender at court rather than be subject to an arrest warrant. Defendant has made all court appearances and will surrender at any time so designated by this Court.

WHEREFORE, Defendant respectfully requests that this Court deny the government's Motion to Revoke Defendant's Bond or, in the alternative, if the Court grants the motion, to allow Defendant the opportunity to self-surrender at a time so designated by this Court.

Respectfully submitted,

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*Attorney for Brent "Pete" Turley*

### **CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, August 29, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties so entitled to such notice and that I have mailed the foregoing by U.S. mail first-class postage prepaid to the following non CM/ECF participant, Brent Turley.

NANCY R. PRICE